

**Commonwealth of Kentucky
Division for Air Quality**

RESPONSE TO COMMENTS

ON THE TITLE V DRAFT PERMIT No. V-03-023Revision 1

University of Kentucky
Room 215, Peterson Building
Lexington, Kentucky 40506
September 23, 2004
Shanaka Ewing, Reviewer
Plant I.D. #: 21-067-00003
Application Log #: 56520

SOURCE DESCRIPTION:

Applications to modify their operating permit application were received from The University of Kentucky on April 29, 2004 and June 23, 2004, and called complete on July 23, 2004. The modification includes installation of two 73mmBtu/hr natural gas fired boilers, a 4000 horsepower diesel generator, and a 20,000 gallon diesel fuel storage tank. The modification applications also included corrections to the initial Title V application submitted to the Division in 1998. Additions in this application include 65 diesel generators ranging from 1 horsepower to over 2885 horsepower (installed between the years 1963 to 2002), five large underground storage tanks for diesel fuel, jet fuel and unleaded gas (constructed between 1972 and 1999), 79 small diesel fuel storage tanks (constructed between 1972 and 1999), and 37 indirect heat exchangers (consisting of 2-125 mmBtu/hr natural gas-fired units, 2-94 mmBtu/hr coal-fired units, 2-75 mmBtu/hr coal-fired units, 2-144 mmBtu/hr natural gas fired unit, and 29-<10 mmBtu/hr units). Two paint spray booths were included which have been permitted since October, 2003. The spray booths have a 2.0 gallons/hr maximum operating rate.

PUBLIC AND U.S. EPA REVIEW:

On August 19, 2004, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Lexington Herald* in Lexington, Kentucky. The public comment period expired 30 days from the date of publication. No comments were received during this period. The permit is now being issued as a proposed permit. The U.S. EPA has 45 days from the date of the issuance to submit comments. If no comments are received during this period, the Division will consider the permit final as conditioned

CREDIBLE EVIDENCE:

This permit contains provisions, which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations